



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 20-001

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]

4. Adequacy of References to Related Statutes, Rules and Forms

Under its summary of factual data and analytical methodologies, the department notes that some statutory pathways to licensure do not require the assessment of pedagogical knowledge and that, therefore, the rule and statutes are not aligned. The department argues that the rule is necessary, in part, to address this difference. However, the proposed rule modifies, but does not eliminate, the requirement that pedagogical knowledge be assessed as part of an approved educator preparation program. The department should consider removing this portion of its argument in support of the rule or should provide additional explanation to clarify how the proposed rule addresses the issue of a difference between the rule and the statutes.

5. Clarity, Grammar, Punctuation and Use of Plain Language

In the agency response to the comments in favor of the rule change, the word “forward” should be replaced with “forwarded”.